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July 1, 2022

U.S. Department of Transportation, Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Amendment to Exemption No. 19054, Petition for Exemption to Conduct Unmanned Aircraft Systems (UAS) Operations Allowed by Special authority for certain unmanned aircraft systems. Title 49 U.S.C. § 44807, and 14 C.F.R. Part 11 seeking relief from condition and limitation 8.

SUMMARY:

On behalf of our client, Osprey Agridrone Solutions LLC, an agricultural services company and pursuant to Title 49 U.S.C. § 44807, Special authority for certain unmanned aircraft systems and 14 C.F.R. Part 11, Osprey Agridrone Solutions hereby respectfully requests to amend their or Exemption, Exemption No. 19054 to add the relief from condition and limitation 8.

Osprey Agridrone Solutions's Flight Operations Manual, safety manual, and all manufacturer's manuals have been previously submitted. A revised training manual is enclosed with this request. A robust SMS case is also enclosed with analysis and justification.

In this particular amendment, the requested exemption would permit the single operation of no more than one DJI AGRAS T-30, as approved in Exemption No. 19054, with the relief added from Condition and Limitation 8, by petitioner, under controlled conditions in predetermined airspace that is, 1) Limited in scope 2) Controlled as to access by mission essential personnel only. Grant of the requested exemption is based upon the concise direction expressed within Title 49 U.S.C. § 44807; the added authority granted by the Act, as amended; an equivalent level of safety regarding flight operations as expressed herein, and significant cost savings achieved by transitioning from traditional manned aerial resources to UASs. The petitioner respectfully requests that the FAA grant the requested exemption without delay.

The name and address of the Petitioner is:

Osprey Agridrone Solutions, LLC.

The primary contact for this petition, with a copy to me at the address above is:

8610 Glenloch Dr.

Ovilla TX, 75154

Attn: Mason Walker

In support of this Petition for Exemption, Osprey Agridrone Solutions will submit the following associated UAS operating documents:

- SMS safety Case seeking relief from Condition and Limitation 8
- Revised Training Manual

These documents will be submitted on a confidential basis under separate cover, pursuant to 14 C.F.R. § 11.35(b), as the documents contain confidential commercial and proprietary information that Osprey Agridrone Solutions has not and will not share with others. The information contained in this material is not generally available to the public and is protected from release under the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*

A. BACKGROUND AND BENEFITS TO THE GENERAL PUBLIC

Osprey Agridrone Solutions, LLC is a diversified provider of agricultural services and is utilizing their experience in agriculture to expand into missions well suited for over 55 lb. UAS/drones to reduce risk and improve efficiencies and value added. Osprey Agridrone Solutions plans to provide a wide array of services in agricultural markets where UAS/drones fit the mission better and safer than manned aircraft. The major benefits to the general public are 1) reduction in injury to ground based applicators in challenging terrain, 2) reduced exposure to chemicals for applicators, 3) reduction in chemical drift compared to manned aircraft application, 4) reduced risk to flight crew compared to manned aircraft, 5) reduced exposure of surrounding beneficial vegetation, 6) more environmentally friendly application with reduced noise, 7) selective use of chemicals for a safer more targeted application, and 8) better value for the customer.

The UASs previously approved for this amendment are the DJI AGRAS T-30.

DJI has an unparalleled presence in the UAS market with steadfast commitment to R&D, a culture of constant innovation and curiosity, and a focus on transforming complex technology into easy-to-use devices. Building on the ethos of “form follows function,” DJI products combine advanced technology with dynamic designs.

Established to produce DJI’s innovative products safely and responsibly, the wholly owned subsidiary Shenzhen Dajiang Baiwang Technology Co., Ltd. is a high-tech manufacturing facility specializing in unmanned aerial vehicles.

In 2016, Dajiang Baiwang passed the ISO 9001:2015 Quality Management System Certification and in 2017 passed the SGS ISO 14001:2015 Environmental Management System Certification.

DJI’s offices can now be found in the United States, Germany, the Netherlands, Japan, South Korea, Beijing, Shanghai, and Hong Kong. As a privately owned and operated company,

DJI focuses on its vision, supporting creative, commercial, and nonprofit applications of their technology.

Today, DJI products are redefining industries. Professionals in filmmaking, agriculture, conservation, search and rescue, energy infrastructure, and more customers trust DJI to bring new perspectives to their work and help them accomplish feats safer, faster, and with greater efficiency than ever before.

Sales of the DJI aircraft have occurred in China, Southeast Asia, and Korea for over six months with a combined total of 1,200,000 hours flown and 20,600,000 flights without any recorded incidents.

C. Relief from condition and limitation 8

Condition and Limitation Number 8 states that:


8. *“All operations must utilize the services of at least one or more visual observers (VO). The VO must be trained in accordance with Osprey Agridrone Solutions’s training program. For purposes of this condition, a VO is someone: (1) who maintains effective communication with the PIC at all times; (2) who the PIC ensures is able to see the unmanned aircraft with human vision as described in Condition and Limitation No. 5; and (3) coordinates with the PIC to scan the airspace where the unmanned aircraft (UA) is operating for any potential collision hazard and maintain awareness of the position of the UA through direct visual observation. The aircraft must be operated within VLOS of both the PIC and VO at all times. The operation must be conducted with a dedicated VO who has no collateral duties and is not the PIC during the flight. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times; electronic messaging or texting is not permitted during flight operations. The VO must maintain visual sight of the aircraft at all times during flight operations without distraction. The PIC must ensure that the VO can perform the duties required of the VO. If either the PIC or a VO is unable to maintain VLOS with the UA during flight, the entire flight operation must be terminated as soon as practicable”.*

To expedite the FAA’s safety assessment of the proposed relief sought, Osprey Agridrone Solutions has included a robust SRM

D. CONCLUSION

For the foregoing reasons, Osprey Agridrone Solutions respectfully requests that the FAA grant this amendment seeking relief from condition and limitation 8. If you need additional information to support Osprey Agridrone Solutions Petition, please do not hesitate to contact the undersigned.

Respectfully Submitted,


Kelly J. Neubecker

Cc. Mason Walker